DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard

Baltimore, Maryland 21244-1850



CENTER FOR MEDICARE

DATE: June 09, 2025

TO: All Medicare Advantage Organizations, Section 1876 Cost Plans, and Health Care

Prepayment Plans

FROM: Gerard Mulcahy

Director, Medicare Enrollment and Appeals Group

Center for Medicare

SUBJECT: Draft Technical Specifications for Service Level Data Collection for

Initial Determinations and Appeals

On May 30, 2025, the Centers for Medicare & Medicaid Services (CMS) published the Service Level Data Collection for Initial Determinations and Appeals (CMS-10905, OMB: 0938-New) for a 30-day public comment period, available at https://www.federalregister.gov/documents/2025/05/30/2025-09813/agency-information-collection-activities-submission-for-omb-review-comment-request. The data collection includes Medicare Advantage (MA) service-level data related to plan initial determinations and appeal decisions that are processed in accordance with the requirements of part 422, subpart M.

CMS developed draft Technical Specifications to ensure MA organizations have the level of detail needed to effectively compile and report these data to CMS (see Appendix 1 to this memo). CMS is seeking comment on these draft Technical Specifications. The comment period ends 30 days from the date of this memo.

Comments should be submitted to the Part C Appeals and Grievances resource portal: https://appeals.lmi.org with the subject line "Service Level Data Collection Technical Specifications."

Appendix 1. Draft Service Level Data Collection for Initial Determinations and Appeals Technical Specifications

A. INTRODUCTION

These technical specifications supplement the Service Level Data Collection for Initial Determinations and Appeals (hereinafter referred to as Service Level Data Collection), and do not change, alter, or add to the data collection described above. The Service Level Data Collection is subject to OMB review and approval in compliance with the Paper Reduction Act of 1995, and its OMB control number is 0938-New.

The technical specifications serve to further define data elements and provide information on how CMS will review and analyze the data. This technical guidance helps assure that MA organizations have a common understanding of the data to be reported and assists in preparing and submitting datasets to help ensure a high level of accuracy in the data reported to CMS, thereby reducing the need to correct and resubmit data.

B. GENERAL INFORMATION

Plans will submit these data via HPMS.

The level of data reported

MA organizations must submit all required data at the contract number/PBP level, (e.g., plan 001 for contract H0000). This plan-level reporting is necessary to permit CMS to conduct appropriate oversight and monitoring of certain areas of the MA program.

	Section	Subsections	Reporting Level	Submission Method
I.	Initial Determinations	I.A. Coverage Decisions I.B. Payment Decisions	Plan	Upload
II.	Reconsiderations	II.A. Coverage Decisions II.B. Payment Decisions	Plan	Upload

Submission of Data

- Compliance with these reporting requirements is a contractual obligation of all MA organizations. Compliance requires data be accurate and submitted in a timely manner. Data submissions are due by 11:59 p.m. Pacific Time on the date of the reporting deadline.
- Only data that reflect a good faith effort by an organization to provide accurate responses to the Service Level Data Collection will count as data submitted in a timely manner.
- CMS tracks resubmissions, including the number of resubmissions made after the deadline. CMS expects data to be accurate on the date of submission.
- CMS urges organizations to store revised data. Organizations must follow record retention requirements, such as maintaining documentation supporting their reported data.

- Organizations should report their data based on their interpretation of the Service Level
 Data Collection and Technical Specifications and should be able to support their decisions.
 Plans may contact the mailbox at https://appeals.lmi.org with additional questions.
- Organizations are required to report complete quarters that precede non-renewal or termination of the plan (PBP) or contract.
 - o For example: If H0000 terminates on May 31, of a given year, the organization is required to report quarter 1/1-3/31 for reporting period of that year. If H0000 non-renews on December 31, of a given year, the organization is required to report all quarters for reporting period of that year.

General Data Entry Rules

- HPMS will not allow the entry of greater than sign (>); less than sign (<); or semicolon (;) in any data entry field or uploaded file.
- Organizations must not submit "placeholder" data (e.g., submitting the value "99999" in reporting fields in HPMS).

Due Date Extension Requests

Generally, CMS does not grant extensions to reporting deadlines, as these will be established and published well in advance. It is our expectation that organizations do their best with the information provided in the most current versions of the technical specifications to prepare for data submission in a timely fashion. Any assumptions that organizations may make in order to submit data timely should be fully documented and defensible under audit. CMS will consider appropriate "Resubmission Requests" through the HPMS Plan Reporting Module (PRM).

Once a reporting deadline has passed, CMS requires MA organizations to submit a formal request to resubmit any data. HPMS designates this request as a Request Resubmission. Approval for resubmission requests will be for 7 days from the date of CMS review and approval of the request. Organizations should not submit resubmission requests until they have data available to submit. Data is late if the submission is after the given reporting period deadline and may not be incorporated within CMS data analyses and reporting. HPMS will not allow the resubmission of data identical to the original data submission.

Correction of Previously Submitted Data / Resubmission Requests

If previously submitted data are incorrect, an organization should request the opportunity to correct and resubmit data. Submission of inaccurate or incorrect data does not satisfy the obligation to report that data when the organization is aware or becomes aware of the inaccuracy. Corrections of previously submitted data are appropriate if due to an error made at the date of the original submission, or as otherwise indicated by CMS. Once a reporting deadline has passed, organizations that need to correct data must submit a formal request to resubmit data via the PRM. A plan can only initiate a resubmission request after the original reporting deadline has expired. Organizations can access detailed instructions for resubmissions in the HPMS Plan Reporting Module User Guide in the Documentation section of the module.

Periodic Updates to the Technical Specifications

- If CMS revises these technical specifications to clarify accurate reporting for data element(s), plans must incorporate changes beginning the following reporting period from the publication date. For example, if CMS releases updated technical specifications in March of a certain year, plans must ensure their Q2 data of that year reflect the revised technical specifications.
- For questions specific to the Service Level Data Collection for Initial Determinations and Appeals, plans may contact the following mailbox: https://appeals.lmi.org. Please be aware immediate responses to individual questions may not always be possible due to volume of inquires received. CMS recommends plans first refer to the current Service Level Data Collection for Initial Determinations and Appeals or Technical Specifications for answers.
- For technical assistance relevant to file formats and uploads, please contact the HPMS help desk: 1-800-220-2028 or email: hpms@cms.hhs.gov.

Exclusions from Reporting

Excluded from this data collection are National PACE Plans and 1833 Cost Plans. Medicare-Medicaid Plans (MMPs) are also excluded from this reporting due to the transition of the Financial Alignment Initiative demonstrations to dual eligible special needs plan (D-SNP) models.

C. REPORTING SECTIONS

I. INITIAL DETERMINATIONS

This section requires file upload into HPMS at the plan-level. Please refer to HPMS layouts and templates for more information.

Organization	Report	Report Period	Due Date(s)
Types Required to	Frequency		
Report	Level		
01 – Local CCP	4/Year Plan	1/1-3/31	5/25/XX (1/1-
02 - MSA		4/1-6/30	3/31)
03 - RFB PFFS		7/1-9/30	
04 - PFFS		10/1-12/31	8/31/XX (4/1-
06 - 1876 Cost			6/30)
11 – Regional CCP			
14 – Employer /			11/30/XX (7/1-
Union Direct (ED)-			9/30)
PFFS			
15 – RFB Local			2/22/XX (10/1-
CCP			12/31)
17 – ED Local CCP			
Organizations			
should include all			
800 series plans.			

Employer/Union		
Direct Contracts		
should also report		
this reporting		
section, regardless		
of organization		
type.		

Data Element ID	Data Element Name	Data Element Description	
Subsection #I.A.	Coverage Decisions (made in the reporting period above)		
A.	Organization Determination (OD) Number	Enter the plan's internal case number.	
В.	Contract Number	Enter the contract number (e.g., H0000) of the organization in which the beneficiary is currently enrolled.	
C.	Plan Benefit Package (PBP)	Enter the PBP (e.g., 001).	
D.	Enrollee MBI	Enter the Medicare Beneficiary Identifier (MBI) of the enrollee excluding hyphens or dashes.	
E.	Requesting Party	Enter the party who made the request: • 01 – enrollee • 02 – enrollee's representative • 03 – contract provider • 04 – non-contract provider	
F.	Provider NPI	Enter requesting or ordering provider's NPI number.	
G.	Item/Service/Part B Drug Code	Enter the CPT, HCPCS, or J code associated with the item/service/Part B drug.	
H.	Item/Service/Part B Drug Description	Enter the name of the item/service/Part B drug if there's no associated code entered in element G.	
I.	Diagnosis Codes	Enter the diagnosis code(s) submitted with the request (e.g., ICD-10, HIPPS codes) as a comma separated list.	
J.	Was prior authorization required?	Enter: • Y for Yes • N for No	
K.	Processing Priority	Enter how the request was processed: • S for Standard • E for Expedited	

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L.	Was the expedited processing request downgraded?	 Enter: Y for Yes if an expedited request was received but downgraded to standard N for No if an expedited request was received and processed under the expedited timeframe S if the request was submitted under the standard timeframe
M.	Date Request Received	Enter the date the request was received. Submit in CCYY/MM/DD format (e.g., 2020/01/01).
N.	Date of Decision	Enter the date of the determination. Submit in CCYY/MM/DD format (e.g., 2020/01/01).
О.	Disposition	Enter: • F for Fully favorable • P for Partially favorable • A for Adverse • D for Dismissal
P.	Decision Rationale	For partially favorable and adverse decisions, enter the reason for the denial: • 01 - Cost Sharing/Benefit Limits • 02 - Coverage Excluded • 03 - Statutory Exclusion • 04 - (not applicable to this subsection) • 05 - Lack of Medical Necessity • 06 - Not Deemed Emergency Care • 07 - Not Deemed Reasonable and Necessary • 08 - Not Urgent Out of Area • 09 - Requested Setting Not Approved • 10 - Procedural/Admin Denial (e.g., untimely filing, billing issue, invalid CPT/diagnosis code, etc.) • 11 - Step Therapy or UM Requirement Not Met
Q.	Dismissal Rationale (if applicable)	For dismissals, enter the reason for the dismissal: • 01 - Requestor is not permitted to request the OD • 02 - Invalid request • 03 - Enrollee died while the request was pending • 04 - Withdrawn

R.	Reviewer Qualifications	If the MA organization expected to issue a partially or fully adverse medical necessity decision based on the initial review of the request, provide the reviewer's qualifications (this includes requests that were ultimately approved, partially approved, or denied) Enter: • P for Physician • O for Other Appropriate Healthcare Professional
S.	Were internal plan coverage criteria applied?	Enter: • Y for Yes • N for No
T.	Did a third-party vendor participate, in any capacity, in the determination review or decision-making?	Enter: • Y for Yes • N for No
Subsection #I.B.	Payment Decisions (made in th	e reporting period above)
A.	Organization Determination (OD) Number	Enter the plan's internal case number.
B.	Contract Number	Enter the contract number (e.g., H0000) of the organization in which the beneficiary is currently enrolled.
C.	Plan Benefit Package (PBP)	Enter the PBP (e.g., 001).
D.	Enrollee MBI	Enter the Medicare Beneficiary Identifier (MBI) of the enrollee, excluding hyphens or dashes.
E.	Requesting Party	Enter the party who made the request: • 01 – enrollee • 02 – enrollee's representative • 03 – contract provider • 04 – non-contract provider
F.	Item/Service/Part B Drug Code	Enter the CPT, HCPCS, DRG or J code associated with the item/service/Part B drug
G.	Item/Service/Part B Drug Description	Enter the name of the item/service/Part B drug if there's no associated code entered in element G.
H.	Diagnosis Codes	Enter the diagnosis code submitted with the request (e.g., ICD-10, HIPPS codes) as a comma separated list.

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T.	Decision rationale	For partially favorable and adverse decisions, enter the reason for the denial:
		• 01 - Cost Sharing/Benefit Limits
		• 02 - Coverage Excluded
		• 03 - Statutory Exclusion
		• 04 - No Prior Authorization
		• 05 - Lack of Medical Necessity
		• 06 - Not Deemed Emergency Care
		• 07 - Not Deemed Reasonable and
		Necessary
		• 08 - Not Urgent Out of Area
		• 09 - Requested Setting Not
		Approved
		• 10 - Procedural/Admin Denial
		(e.g., untimely filing, billing issue,
		invalid CPT/diagnosis code, etc.)
		• 11 - Step Therapy or UM
		Requirement Not Met
U.	Reviewer qualifications	Enter:
		• P for Physician
		• O for Other Appropriate Healthcare
		Professional
V.	Were internal plan criteria	Enter:
	applied?	• Y for Yes
		• N for No
W.	Was prior approval (e.g., a prior	Enter:
	authorization or voluntary pre-	• Y for Yes
**	service request) requested?	• N for No
X.	If element V is yes, provide OD	Enter the OD number for the prior
	number for associated prior	approval request associated with the
**	approval request	payment request.
Y.	If element V is yes, was prior	Enter:
	authorization a required	• Y for Yes
7	condition for coverage?	• N for No
Z.	Did a third-party vendor	Enter:
	participate, in any capacity, in	• Y for Yes
	the determination's review or	• N for No
	decision-making?	

II. RECONSIDERATIONS

This section requires file upload into HPMS at the plan-level. Please refer to HPMS layouts and templates for more information.

Organization	Report	Report Period	Due Date(s)
Types Required to	Frequency		
Report	Level		

		,	
01 – Local CCP	4/Year	1/1-3/31	5/25/XX (1/1-
02 - MSA	Plan	4/1-6/30	3/31)
03 - RFB PFFS		7/1-9/30	
04 - PFFS		10/1-12/31	8/31/XX (4/1-
06 – 1876 Cost			6/30)
11 – Regional CCP			
14 – Employer /			11/30/XX (7/1-
Union Direct (ED)-			9/30)
PFFS			
15 – RFB Local			2/22/XX (10/1-
CCP			12/31)
17 – ED Local CCP			
Organizations			
should include all			
800 series plans.			
Employer/Union			
Direct Contracts			
should also report			
this reporting			
section, regardless			
of organization			
type.			

Subsection	Coverage Decisions (made in the reporting period above)		
#II.A.			
A.	Associated Organization	Enter the plan's OD number	
	Determination (OD) Number	associated with the appeal.	
B.	Appeal Number	Enter the plan's appeal number.	
C.	Contract Number	Enter the contract number (e.g.,	
		H0000) of the organization in which	
		the beneficiary is currently enrollee.	
D.	Plan Benefit Package (PBP)	Enter the PBP (e.g., 001).	
E.	Enrollee MBI	Enter the Medicare Beneficiary	
		Identifier (MBI) of the enrollee,	
		excluding hyphens or dashes.	
F.	Date Request Received	Enter the date the request was	
	_	received. Submit in CCYY/MM/DD	
		format (e.g., 2020/01/01).	
G.	Date of Decision	Enter the date of the determination.	
		Submit in CCYY/MM/DD format	
		(e.g., 2020/01/01).	
H.	Processing Priority	Enter how the request was processed:	
		• S for Standard	
		• E for Expedited	
I.	Was the expedited processing	Enter:	
	request downgraded?		

		 Y for Yes if an expedited request was received but downgraded to standard N for No if an expedited request was received and processed under the expedited timeframe S if the request was submitted under
J.	Is this an appeal of an OD dismissal?	the standard timeframe Enter: • Y for Yes
K.	Disposition	 N for No Enter: F for Fully favorable P for Partially favorable A for Adverse
L.	Dismissal Rationale (if applicable)	• D for Dismissal For dismissals, enter the reason for the dismissal:
		 01 - Requestor is not a proper party to the OD 02 - Invalid request 03 - Untimely request 04 - Enrollee died while the request was pending 05 - Withdrawn
M.	Decision Rationale	For partially favorable and adverse decisions, enter the reason for the denial: • 01 - Cost Sharing/Benefit Limits • 02 - Coverage Excluded • 03 - Statutory Exclusion • 04 - No Prior Authorization • 05 - Lack of Medical Necessity • 06 - Not Deemed Emergency Care • 07 - Not Deemed Reasonable and Necessary • 08 - Not Urgent Out of Area • 09 - Requested Setting Not Approved • 10 - Procedural/Admin Denial (e.g., untimely filing, billing issue, invalid CPT/diagnosis code, etc.) • 11 - Step Therapy or UM Requirement Not Met
N.	Was the initial OD request denied for lack of medical necessity?	Enter: • Y for Yes • N for No

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O.	Was the reconsideration request	Enter:
	reviewed by a physician?	• Y for Yes
		• N for No
P.	Did a third-party vendor	Enter:
	participate, in any capacity, in	• Y for Yes
	the determination's review or	• N for No
	decision-making?	
Subsection	Payment Decisions (made in the	e reporting period above)
#II.B.		
A.	Associated Organization	Enter the plan's OD number
	Determination (OD) Number	associated with the appeal.
B.	Appeal Number	Enter the plan's appeal number
C.	Contract Number	Enter the contract number (e.g.,
		H0000) of the organization in which
		the beneficiary is currently enrolled.
D.	Plan Benefit Package (PBP)	Enter the PBP (e.g., 001).
E.	Enrollee MBI	Enter the Medicare Beneficiary
		Identifier (MBI) of the enrollee,
		excluding hyphens or dashes.
F.	Date Request Received	Enter the date the request was
	•	received. Submit in CCYY/MM/DD
		format (e.g., 2020/01/01).
G.	Date of Decision	Enter the date of the determination.
		Submit in CCYY/MM/DD format
		(e.g., 2020/01/01). For claims
		payment enter the data of payment in
		CCYY/MM/DD format.
		This is the date the determination was
		entered in the system and may be the
		same as the date claim was paid.
H.	Date Claim was Paid (if	Enter the date the reconsidered claim
	applicable)	was paid. Submit in CCYY/MM/DD
	,	format (e.g., 2020/01/01).
		Leave blank if payment was not
		provided or if the request was denied.
I.	Is this an appeal of an OD	Enter:
	dismissal?	• Y for Yes
		• N for No
J.	Disposition	Enter:
	_	• F for Fully favorable
		• P for Partially favorable
		• A for Adverse
		• D for Dismissal
K.	Dismissal Rationale (if	For dismissals, enter the reason for
	applicable)	the dismissal:
	/	• 01 - Requestor is not a proper
		party to the OD
		• 02 - Invalid request

		• 03 - Untimely request
		• 04 - Enrollee died while the
		request was pending
		• 05 - Withdrawn
L.	Decision Rationale	For partially favorable and adverse
		decisions, enter the reason for the
		denial:
		• 01 - Cost Sharing/Benefit Limits
		• 02 - Coverage Excluded
		• 03 - Statutory Exclusion
		• 04 - No Prior Authorization
		• 05 - Lack of Medical Necessity
		• 06 - Not Deemed Emergency Care
		• 07 - Not Deemed Reasonable and
		Necessary
		• 08 - Not Urgent Out of Area
		• 09 - Requested Setting Not
		Approved
		• 10 - Procedural/Admin Denial
		(e.g., untimely filing, billing issue,
		invalid CPT/diagnosis code, etc.)
		• 11 - Step Therapy or UM
		Requirement Not Met
M.	Was the initial OD request	Enter:
	denied for lack of medical	• Y for Yes
	necessity?	• N for No
N.	Was the reconsideration request	Enter:
	reviewed by a physician?	• Y for Yes
		• N for No
O.	Did a third-party vendor	Enter:
	participate, in any capacity, in	• Y for Yes
	the determination's review or	• N for No
	decision-making?	

Edits and Validation Checks: Validation checks should be performed by each organization prior to data submission. For example, contracts should validate that the reconsideration 'date request received' field is later than or equal to the 'date of decision' field for the organization determination.

Notes:

• Organization determinations and reconsiderations should be included, if the request is consistent with the applicable regulations. For instances when the organization approves an initial request for an item or service (e.g., physical therapy services) and the organization approves a separate additional request to extend or continue coverage of the same item or service, include the decision to extend or continue coverage of the same item or service as another, separate, fully favorable organization determination.

- If an organization determination includes more than one service, include all the decision's
 multiple line items as separate entries. Each entry will have the same organization
 determination number.
- Requests submitted by staff of a physician's office on behalf of the physician (e.g., request is on said physician's letterhead) should also be reported as contract or non-contract provider, as appropriate.
- The provider's NPI must be reported on a service decision when the request is submitted by (or on behalf of) a provider or when an enrollee submits a service request and identifies a provider had ordered the requested item, service, or Part B drug or the enrollee requested to receive the item, service, or Part B drug from a specific provider.

Definitions for purposes of plan reporting:

- Adverse decision for reporting purposes means an item, service, or Part B drug was denied in whole.
- Clean Claim as defined at 42 CFR §422.500(b), is a claim that has no defect, impropriety, lack of any required substantiating documentation (consistent with 42 CFR §422.310(d)), or particular circumstance requiring special treatment that prevents timely payment and that otherwise conforms to the clean claim requirements for equivalent claims under Original Medicare.
- Fully Favorable decision means an item, service, or Part B drug was covered in whole.
- **Internal Coverage Criteria** refers to an MA organization's established coverage criteria as defined in 42 CFR § 422.101(b)(6).
- Organization Determination is a plan's response to a request for coverage (payment or provision) of an item, service, or Part B drug, including auto-adjudicated claims, service authorizations which include prior-approvals (authorization that is issued prior to the services being rendered), concurrent authorization (further defined below), requests to continue previously authorized ongoing courses of treatment, and the reduction or discontinuation of covered provider or hospital services. It includes pre-service organization determination requests submitted by the enrollee, enrollee's representative, contract provider on behalf of the enrollee and requests from non-contract providers. This also includes claims payment requests from non-contract and contract providers.
- Concurrent Authorization is a coverage decision on an item, service, or Part B drug made by a plan contemporaneously to when an enrollee is receiving the item, service, or Part B drug at issue when there wasn't a prior authorization decision in advance.
- Partially Favorable decision means an item, service, or Part B drug was partially covered. For example, if a claim has multiple line items, some of which were paid and some of which were denied, it would be considered partially favorable. Also, if a pre-service request for 10 therapy services was processed, but only 5 were authorized, this would be considered partially favorable.
- **Prior Approval** refers to coverage decisions made before the provision of the item, service, or Part B drug at issue. This includes requests for items, services, or Part B drugs which are subject to a plan's prior authorization requirements (i.e., prior authorization requests) as

- well as requests for items, services, or Part B drugs that are not subject to a plan's prior authorization requirements (i.e., voluntary pre-service requests).
- **Reconsideration** is a plan's review of an adverse or partially favorable organization determination as defined in 42 CFR § 422.580.

Report:

- Completed organization determinations and reconsiderations (i.e., all required notification has occurred) during the reporting period, regardless of when the request was received. Plans are to report organization determinations or reconsiderations where a substantive decision has been made, as described in this section and processed in accordance with the organization determination and reconsideration procedures described under 42 C.F.R. Part 422, Subpart M.
- A denial of a Medicare request for coverage (payment or provision) of an item or service as either partially favorable or adverse, regardless of whether Medicaid payment or provision ultimately is provided, in whole or in part, for that item or service. However, Dual Eligible Special Needs Plans (D-SNPs) that are applicable integrated plans as defined in 42 CFR § 422.561 should report a request for a Medicare item or service based on the outcome of applying both Medicare and Medicaid coverage criteria.
- Denials based on exhaustion of Medicare benefits.
- Organization determinations that involve hospital discharges and transfers to post-acute care settings.
- Include all requests for supplemental services that meet the criteria defined in 42 CFR § 422.100(c)(2).

Do Not Report:

- Independent Review Entity (IRE) decisions.
- Reopenings requested or completed by the IRE, Administrative Law Judge (ALJ), or Appeals Council.
- Duplicate payment requests concerning the same service or item.
- Payment requests returned to a provider/supplier in which a substantive decision (fully favorable, partially favorable or adverse) has not been made—e.g., payment requests or forms are incomplete or do not meet the requirements for a Medicare claim (e.g., due to a clerical error).
- Part B drugs that are paid or denied at the pharmacy and point-of-sale Part B drug claim rejections are not reportable as organization determinations. If the plan subsequently processes an organization determination, this should be reported.
- A Quality Improvement Organization (QIO) review of an individual's request to continue Medicare-covered services (e.g., a SNF stay) and any related claims/requests to pay for continued coverage based on such QIO decision.
- A service only covered under the plan's Medicaid benefits and never covered by Medicare and not covered by the MA plan as a supplemental Medicare benefit (such as Medicaid home-and community-based long-term services and supports).
- Plan decisions regarding a request to vacate a dismissal.